

Exhibit A

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

SPECTRUM WT,

Plaintiff,

v.

WALTER WENDLER, *et al.*,

Defendants.

CASE NO. 2:23-cv-048-Z

DECLARATION OF JAMES WEBB

Pursuant to 28 U.S.C. § 1746, I, James Webb, declare the following:

1. My name is James Webb and I am the Vice President for Information Technology and Chief Information Officer for WTAMU. I am over eighteen (18) years of age and competent to make the following statement. The facts stated in this declaration are within my personal knowledge and are true and correct.
2. At the request and direction of the A&M System Office of General Counsel (OGC), I worked to locate and provide responsive documents to: (1) Plaintiff's First Set of Requests for Production to Defendant Walter Wendler, dated October 8, 2025; and (2) Plaintiff's First Set of Requests for Production to Defendant Christopher Thomas, dated October 8, 2025.
3. I coordinated and obtained responsive documents to each of the requests on behalf of President Walter Wendler and Vice President for Student Affairs Chris Thomas. I also conducted follow-up searches for documents and all items, including deleted, drafts, or archived information, and included any and all documents and communications regarding drag shows or the cancellation of such events with WT staff and other individuals, drafts of statements made by President Wendler on the

cancellation of the drag shows, catalogued emails, complaints and/or support for Dr. Wendler's decisions, and other requested documents.

4. In addition, my office conducted keyword searches of emails and other data or electronically stored information based on search terms and custodians.
 - a. Custodians for searches included Walter Wendler, Chris Thomas, Tracee Post, Todd Rasberry, Amberly Winningham, Chance Haugen, Angela Spaulding, Randy Rikel, Richard Smith, Amber Black, Nancy Hampton, Angela Allen, Shawn Fouts, Chari Hill, Julie Eatley, Chip Chandler, Evelyn Montoya, Ransom Colette, Shawn Burns, Kyle Hawbaker.
 - b. Search terms of documents from 2022 to present included "drag show", "A Fool's Drag Race", "Sam Houston" /s (drag show), "Don't be a drag" /s show, "queer movie night", gender ideology executive order, H.B. 229, Abbott or "Governor Abbott" /s drag, "board resolution" /s drag, Draggieland, quincinera, spectrum.:
 - c. Additional search terms of documents for Walter Wendler included the following: Alex or Cheryl Fairly, "Code of Student Life", "Student Rules", "Student Handbook", LGBT!, drag /s show!, "law of the land", "First Amendment", "free speech", "freedom of speech", "freedom of expression", "free expression", "executive order", "ideology", "gender", "sexualized", "obscene", "obscenity", and "lewd."
5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 1, 2025.

James Webb
JAMES WEBB